

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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LAWRENCE I. FRIEDMANN,

Plaintiff,

-against-

RAYMOUR FURNITURE CO., INC.,
and LUCY GOLDSTEIN, *individually,*

Defendants.
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12 CV 1307 (LDW)(AKT)

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that, Plaintiff LAWRENCE I. FRIEDMANN, by his attorneys, The Harman Firm, PC, hereby serves notice, pursuant to Federal Rule of Civil Procedure 30(b)(6), that the testimony upon oral examination of a representative of Defendant RAYMOUR FURNITURE CO., INC., specifically as they relate to matters detailed in *Exhibit A*, attached hereto, will be taken before a notary public who is not an attorney, or an employee of any attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at The Harman Firm, PC, located at 200 West 57th Street, Suite 900, New York, New York 10019, beginning on the 17th day of January 2013, at 10:00 a.m., with respect to evidence material and necessary in the prosecution of this action.

PLEASE TAKE FURTHER NOTICE that the said oral examination will continue from day to day until completed. Plaintiffs reserve the right to use electronic, audio and visual means to record said examination in conjunction with or instead of stenographic recordings, pursuant to applicable Court rules.

Dated: New York, New York
December 19, 2012

By: s/
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EXHIBIT A

Testimony Sought by Plaintiff from Witnesses pursuant to Fed. R. Civ. P. 30(b)(6)

Plaintiffs seeks testimony from Defendants' 30(b)(6) witnesses on the following matters:

1. All information related to anti-discrimination policies at Defendant RAYMOUR FURNITURE CO., INC.;
2. All information related to disabilities and accommodation of disabilities in the workplace at Defendant RAYMOUR FURNITURE CO., INC.;
3. All affirmative defenses asserted by Defendants and or to be relied upon in any pleading up to and including trial.